

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA :
: 1:14CR308-1
v. :
:
SARAH EURY FARRELL :
:

**GOVERNMENT'S MOTION FOR ISSUANCE
OF AN ORDER OF FORFEITURE**

NOW COMES the United States, by and through Ripley Rand, United States Attorney for the Middle District of North Carolina, and respectfully submits the United States' Motion for Issuance of an Order of Forfeiture in the above-styled case. In support thereof, the United States sets forth the following:

1. On July 30, 2014, the defendant, SARAH EURY FARRELL, was charged in an Information in case number 1:14CR308-1, referring unauthorized aliens for employment, in violation of Title 8, United States Code, Section 1324a(a)(1)(A) and 1324(f)(1).

2. The Information further sought the forfeiture of any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the defendant is convicted; and any property, real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the defendant is convicted, or that is used to facilitate,

or is intended to be used to facilitate, the commission of the offense of which the defendant is convicted. The property to be forfeited includes, but is not limited to, a sum of money equal to not less than \$16,300.00 in U.S. currency.

3. On July 31, 2014, the defendant SARAH EURY FARRELL pled guilty to Counts One and Two of the Information.

4. The defendant, SARAH EURY FARRELL, is subject to and consented to the entry of a forfeiture money judgment against her in the amount of Sixteen Thousand Three Hundred and 00/100 Dollars (\$16,300.00), in that such sum constitutes proceeds derived from the criminal violation to which she has pled guilty.

5. The United States has not, as of this date, identified specific assets belonging solely to the defendant that were derived from or facilitated the offense for which the defendant has pled guilty. Nor has the United States yet identified any property belonging solely to the defendant that could be forfeited as a substitute asset in accordance with Title 21, United States Code, Section 853(p).

6. Accordingly, the United States seeks the entry of an Order of Forfeiture consisting of a personal money judgment against the defendant in the amount of Sixteen Thousand Three Hundred and 00/100 Dollars (\$16,300.00).

7. The entry of an Order of Forfeiture in the form of a personal money judgment is specifically authorized by Rule 32.2(b) of the Federal Rules of Criminal Procedure. Such orders become final as to the defendant at sentencing or at any time before sentencing if the defendant consents.

8. Pursuant to Rule 32.2(c)(1), no ancillary proceeding is required to the extent that the forfeiture consists of a money judgment.

WHEREFORE, by virtue of the guilty plea and the determination of the amount of money derived from the offense for which the defendant has been convicted, a money judgment should be entered against the defendant.

Accordingly, the United States respectfully requests that this Court enter an Order of Forfeiture as proposed in the attached Order.

This the 27th day of October, 2014.

Respectfully submitted,

RIPLEY RAND
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2014, the foregoing Government's Motion for Issuance of an Order of Forfeiture was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Joshua Brian Howard, and I hereby certify that the document was mailed to the following non-CM/ECF participants:
None.

Respectfully submitted,

RIPLEY RAND
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